

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**ROBERT LUCIOUS TONEY,**  
[DOB: 06/04/1952]

Defendant.

No. 19-04018-01-CR-C-BCW

**COUNTS 1 and 2**

21 U.S.C. § 841(a)(1)

NLT 10 Years and NMT Life Imprisonment

NMT \$10,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

**COUNT 3**

18 U.S.C. § 1952(a)(3)

NMT 5 Years Imprisonment

NMT \$ 250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

\$100 Special Assessment for each count

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT 1**

(Distribution of Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about December 14, 2018, within Boone County, in the Western District of Missouri, the defendant, **ROBERT LUCIOUS TONEY**, knowingly and intentionally distributed 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

**COUNT 2**

(Possession with Intent to Distribute Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about January 18, 2019, within Callaway County, in the Western District of Missouri, the defendant, **ROBERT LUCIOUS TONEY**, knowingly and intentionally possessed

with the intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

**COUNT 3**  
(Interstate travel in Aid of Racketeering Enterprise)  
18 U.S.C. § 1952(a)(3)

On or about December 14, 2018, in the Western District of Missouri and elsewhere, the defendant, **ROBERT LUCIOUS TONEY**, traveled in interstate commerce from the State of Kansas to the State of Missouri, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, a business enterprise involving narcotics and controlled substances in violation of 21 U.S.C. § 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

**A TRUE BILL.**

/S/ Samie Hill

**FOREPERSON OF THE GRAND JURY**

/S/ Aaron M. Jolly

**Aaron M. Jolly**

Special Assistant United States Attorney  
Missouri Bar No. 70155

Dated: 02/13/2019